

SAPONE & PETRILLO, LLP

William S. Petrillo, Esq., Partner
Edward V. Sapone, Esq., Partner

Michael Vitaliano, Esq., Associate

MANHATTAN
40 Fulton Street, 23rd Floor
New York, New York 10038
Telephone: (212) 349-9000
Facsimile: (212) 349-9003
E-mail: ed@saponepetrillo.com

LONG ISLAND
1103 Stewart Avenue, Suite 200
Garden City, New York 11530
Telephone: (516) 678-2800
Facsimile: (516) 977-1977
E-mail: william@saponepetrillo.com

July 23, 2021

Hon. P. Kevin Castel
U.S. District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: *United States of America v. Thomas Bistriz*
Indictment No.: 21-CR-140

Dear Judge Castel,

I am retained counsel to Defendant Thomas Bistriz in the above-referenced the (delete the) case. A status conference is scheduled for July 26, 2021 at 3:00 p.m. I write to respectfully ask for a 30-day adjournment, as I will be traveling outside of the United States until July 30, 2021.

The government, by AUSA Jarrod Schaeffer, and I have been actively engaged in plea negotiations. We believe the parties are close to a resolution of this case.

The Government consents to this request. In addition, we consent to the exclusion of time between July 26, 2021 and the next date set by the Court.

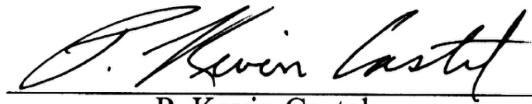
Your Honor's consideration is greatly appreciated.

Respectfully submitted,

/s/ Edward V. Sapone
Edward V. Sapone

cc: A.U.S.A. Samuel Rothschild (via ECF)
A.U.S.A. Jarrod Schaeffer (via ECF)

Upon the application of defense counsel, consented to by the government, the status conference originally scheduled for July 26, 2021 is adjourned to August 30, 2021 at 2:00 p.m. and will proceed by videoconference. I find that the ends of justice will be served by granting a continuance and that taking such action outweighs the best interest of the public and the defendant in a speedy trial. The reasons for this finding are that the grant of the continuance is necessary to accommodate defense counsel's schedule. Accordingly, the time between today and August 30, 2021 is excluded.
SO ORDERED.


P. Kevin Castel
United States District Judge

Dated: July 23, 2021